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**Pickaway Metropolitan
Housing Authority**

TTY/TDD Customers:
Contact Ohio Relay Services
@711 or 1-800-750-0750



Williamsport Terrace Management Plan

Revised February, 1992
Revised May 24, 1995
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Revised September 21, 2018
Revised September 8, 2021

1. The Role and Responsibility of the Owner and the Relationship and Delegations of Authority to the Management Agent.

- a. The Owner of the Project is the Pickaway Metropolitan Housing Authority, hereinafter referred to as Owner, Pickaway MHA, PMHA, Authority or Agency, an Agency duly created pursuant to the authority of the Constitution and Statutes of the State of Ohio, including, particularly, ORC 3935.27, et. Seq. The Pickaway Metropolitan Housing Authority is governed by a five (5) Member Board of Commissioners, whose members are appointed by local governmental officials. Board members serve without remuneration, establish policy for the agency and hire the Executive Director.

The Project also will be managed by the Pickaway Metropolitan Housing Authority.

Currently, the Agency is staffed by an Executive Director, a Finance Manager, a Program Manager, a Program Specialist, an Office Specialist, an Agency Specialist and Maintenance Personnel.

The Executive Director will essentially function as a Management Agent for the Board. Since the Board serves without pay, no conflict of interest may be deemed to exist.

- b. The supervisory relationships that current exist are as follows:
- The Program Manager, Program Specialist and Agency Specialist for the Pickaway MHA are responsible for completing Intake, Certification and day-to-day management of the property.
 - The Program Manager for the Pickaway MHA is responsible for program compliance at Williamsport Terrace, and for the day-to-day supervision of the Program Specialist and the Agency Specialist.
 - The Maintenance Manager for PMHA assists in the day-to-day operation, and coordinates specific maintenance activities with Program Manager, Program Specialist and Agency Specialist. This includes all aspects of the maintenance and grounds operation. The Maintenance Manager is responsible for supervising all other maintenance related personnel.
 - The Finance Manager of the Pickaway MHA is responsible for the financial stability and record-keeping of Williamsport Terrace.
 - The Executive Director of the Pickaway MHA assumes supervisory responsibilities for all parties involved in the management and operation of Williamsport Terrace. The Executive Director, therein, also serves as the key contact for inquiries related to Williamsport Terrace; the Program Manager would be the primary contact for day-to-day operation and management questions or issues. The Finance Manager would be the primary contact for financial questions pertaining to Williamsport Terrace, and the Maintenance Manager would be the primary contact for questions related to maintaining the properties and grounds.
 - The Office Specialist handles all intake of applications and scheduling of intake appointments. She/he completes law enforcement screening for applicants prior to the intake appointment. This person is also responsible for maintaining the agency website, and serves as the in-house IT person. This person is supervised by the Executive Director.

Day-to-day operations of Williamsport Terrace can include, but not be limited to the following types of activities: maintaining the property and grounds, rental of all units, maintaining resident records and files, handling all accounting and collection of funds, paying all bills incurred by the project, submitting all necessary reports to Rural Development, and assuring that Rural Development regulations are met.

- c. The Pickaway MHA shall have day-to-day authority in the management of Williamsport Terrace. All actions of the Pickaway MHA staff are subject to review by the PMHA Board of Commissioners.

Non-routine issues will be reported to the Board of Commissioners at their monthly meeting (example: fire, break-in, changes in insurance coverage's, etc.). All emergencies will be addressed by the Pickaway MHA staff immediately and reported to the Board of Commissioners at their next meeting (displacement due to fire as an example). Matters of extreme emergency will be reported to the Chairman of the Board of Commissioners and reported to other members at his/her direction (natural disaster incidents such as tornado damage, physical or violent assault, drug bust or arrest, etc, as examples).

The Pickaway MHA will follow the adopted Procurement Policy of the Agency in the purchase of any goods or services for the Williamsport Terrace property.

- d. As stated previously, contact personnel for Williamsport Terrace are as follows:
 - Executive Director, Pickaway MHA
 - Finance Manager, Pickaway MHA
 - Maintenance Manager, Pickaway MHA
 - Program Manager, Pickaway MHA
 - Program Specialist, Pickaway MHA
 - Office Specialist, Pickaway MHA
 - Agency Specialist, Pickaway MHA
 - Chairman, Board of Commissioners, Pickaway MHA
- e. As the key contact person, the Executive Director of the Pickaway MHA is responsible for the operation and management of Williamsport Terrace. The delegation of responsibilities and the guidance of management decisions fall under the jurisdiction of this position. Guaranteeing proper training for all staff personnel is a primary responsibility to ensure that day-to-day management decisions are sound and compliant.
- f. The Pickaway Metropolitan Housing Authority is both the Owner and the Managing Agent of Williamsport Terrace. There are no areas of overlap.
- g. There are no pro rata divisions of singularly incurred operating expenses that is common to both the management agency and the owner because these two entities are one in the same. SHARP coverage for the Pickaway MHA staff is part of their liability coverage as an agency and would be prorated in costs among all programs that this agency manages.

2. Personnel Policy and Staffing Arrangements

All hiring shall be in accordance with the appropriate Equal Opportunity Laws.

- a. The Pickaway MHA follows two primary methods of hiring personnel:
 - Promotion from within and recruitment of residents
 - Advertising

When a vacancy occurs within the organization or a position is created, it is posted so that any current personnel have the opportunity to apply.

If the vacancy cannot be filled in this manner, a notice of employment opportunity is posted in the local newspaper of daily circulation, or the local JFS public employment agency, Jobs One Stop. Additionally, listings with employment agencies such as Indeed can be placed to ensure we are reaching all suitable applicants.

The Pickaway MHA has an adopted Personnel Policy that includes the following statements concerning nondiscrimination:

- A. The Housing Authority is an equal opportunity employer. No personnel decisions concerning any term or condition of employment shall be unlawfully based upon an individual's race, color, religion, sex, national origin, age, familial status, sexual orientation, reprisal or disability.
- B. The Finance Manager and Office Specialist are the Housing Authority's EEO/ADA and 504 Coordinators. The EEO/ADA and 504 Coordinators are responsible for providing information regarding antidiscrimination employment laws to employees and applicants, and for reviewing and resolving complaints involving alleged discrimination.
- C. The EEO/ADA and 504 Coordinators shall be responsible for formulating, implementing, coordinating, and monitoring all efforts to prevent unlawful discriminations in the workplace. The EEO/ADA

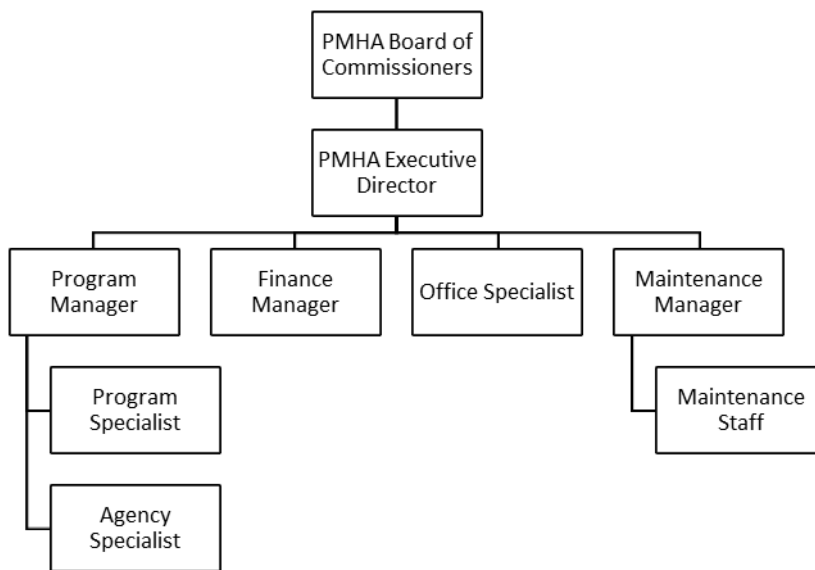
Coordinators shall maintain responsibility in regard to offering equal opportunity to each employee or job applicant and for attempting to resolve discrimination complaints not personally involving a Coordinator.

- D. No inquiry shall be made prior to employment regarding the applicant's race, color, age, religion, sex, national origin, familial status, sexual orientation, reprisal or disability, except as necessary to gather equal employment opportunity or other statistics that, when compiled, will not identify any specific individual. Disclosure of this information is a voluntary action on the applicant's part.
- E. It is the policy of the Housing Authority to comply fully with all federal, state, and local nondiscrimination laws and with rules and regulations governing Fair Housing and Equal Opportunity in housing.
- F. Housing Authority employees shall not discriminate because of race, color, sex, religion, familial status, disability, age, national origin sexual orientation and reprisal, or marital status in the leasing, rental, or other disposition of housing or related facilities, including land, that is part of any project or projects under the Housing Authority's jurisdiction covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.
- G. Posters and housing information shall be displayed in locations throughout the Housing Authority's office in such a manner as to be easily readable from a wheelchair.
- H. Housing Authority employees shall not, on account of race, color, sex, religion, familial status, disability, age, sexual orientation or reprisal, national origin, or marital status:
 - 1. Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs;
 - 2. Provide housing that is different from that provided to others;
 - 3. Subject a person to segregation or disparate treatment;
 - 4. Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
 - 5. Treat a person differently in determining eligibility or other requirements for admission; or
 - 6. Deny a person access to the same level of services.
- I. It is the policy of the Housing Authority to provide courteous and efficient service to all applicants for housing assistance. In that regard, Housing Authority employees shall make every reasonable effort to accommodate persons with disabilities, as well as those persons with language and literacy barriers.
- J. The Housing Authority includes the Rural Development non-discrimination statement on the agency letterhead and on verification forms. This letter-head is used for all correspondence.

The Pickaway MHA has an adopted Personnel Policy that includes the following statements concerning vacancies:

- A. The Housing Authority is an equal opportunity employer in which available vacancies, which the Housing Authority intends to fill, will be posted internally and externally, and awarded to the best qualified of the candidates.
- B. Notices of such vacancies shall specify the job title, nature of the duties, required qualifications, essential functions; and shall display the deadline and/or location for making application.
- C. The Executive Director, or his/her designee(s), will evaluate the candidates through appropriate means which may include either written or skills demonstration testing; and shall thereafter select the candidate or candidates that he/she determines to be best qualified. Fully qualified, current employees will be given first consideration for transfer or promotion to a vacant position. Qualifications, not length of service will be used to determine internal transfers or promotions. The Housing Authority may also afford a hiring preference to current residents.
- D. All conditional and formal offers of employment with the Housing Authority will be in writing and must be authorized by the Executive Director and Pickaway MHA Board of Commissioners.

- b) The staffing plan for Williamsport Terrace includes the following personnel:
- Office Specialist: Intake, scheduling and general office responsibilities
 - Program Manager and Specialist: handle day-to-day oversight of the property, handle tenant complaints or issues; completes certifications of tenants at intake, annual and interim periods
 - Maintenance Staff: completes maintenance needs of property
 - Finance Manager: assures financial compliance and stability of program
 - Executive Director: supervises staff and delegation of responsibilities; coordinates improvements to property, and interacts with Board of Commissioners in decision making responsibilities.
- c) The lines of authority, responsibility and accountability are as follows:



Concerning internal controls, the Program Manager and Specialist accept rental and other payments from the residents, collect the on-site laundry coins with two persons present, prepare and complete the daily banking via remote capture, and submit all receipts and bank deposits slips to the Finance Manager. The Finance Manager completes the accounting for each project and each resident household.

Bank statement reconciliations are prepared by the Finance Manager, are then reconciled each month by a PMHA Staff member, and finally reviewed by the Executive Director.

- d) Employees who are responsible for calculations are trained annually on public and multi-family housing rent calculation methods, and are given updates on Rural Development manuals and guidance as it is received in the PMHA office. Agenda's for Rural Development trainings are reviewed and appropriate staff are assigned to attend trainings. A copy of the Rural Development Management Book is located in staff offices for review.

3) **Plans and Procedures for Marketing Units, Achieving and Maintaining Full Occupancy, and Meeting HUD Form 933.2, "Affirmative Fair Housing Marketing Plan" Requirements**

It is the policy of the Pickaway Metropolitan Housing Authority to fully comply with all Federal, State and local nondiscrimination laws; the Americans with Disabilities Act, and the U.S. Department of Housing & Urban Development regulations governing Fair Housing and Equal Opportunity.

To further commitment for full compliance with applicable Civil Rights laws, the Pickaway Metropolitan Housing Authority will provide Federal, State and local information to applicants and residents of all housing programs regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information is available to individuals throughout all states of their involvement with Pickaway MHA. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The Pickaway MHA will assist any family that believes they have suffered illegal discrimination by directing them to the nearest Legal Aid office, and by providing them with the nearest address of the Office of Fair Housing and Equal Opportunity, and all other appropriate agencies.

Specifically, it is the United States Department of Agriculture's policy that no person shall be discriminated against on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs). This policy will be communicated to the public through all appropriate USDA public information channels, in English or languages appropriate to the local population and in alternative means of communication (Braille, large print, audiotape, etc.)"

The nondiscrimination statement shown below shall be posted in all recipient offices, and included, in full, on all materials regarding such recipient's programs that are produced by the recipients for public information, public education, and public distribution:

"In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, age, disability, religion, sex, familial status, sexual orientation and reprisal. (Not all prohibited bases apply to all programs).

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or 800-877-8339 (TDD)."

When the material is too small to permit the full statement to be included, the material will at a minimum, include the statement in print size no smaller than the text, that states, "This institution is an equal opportunity provider, and employer."

- a) Affirmative Marketing practices are used to attract potential residents to Williamsport Terrace, without regard to race, color, religion, national origin, sex, familial status, age, sexual orientation, reprisal, or disability.

Advertising and communication are the key methods of reaching a diverse population. Advertising by using the aforementioned wording in the local daily newspaper, the community resource guide and in other publications and brochures have been successful sources in past attempts. In addition, letters are sent annually to the directors of local service agencies requesting that all staff be reminded of the service provided by Pickaway MHA.

A brochure detailing the services of Pickaway MHA is distributed at community wide functions in which the agency is invited to participate and at local offices of public agencies.

The site sign is also located in a very visible location at the entrance to the street locating the residential apartments.

Units will be advertised when the active waiting list drops below twenty percent (20%) of the total units available.

- b) All applicants are placed on the waiting list as of the date and time of application. Applications are processed in anticipation of vacancy. At all times, Pickaway MHA staff will strive to have at least one application processed for both one and two bedroom apartments.

Any eligible applicant who applies will be placed on the waiting list for Williamsport Terrace. All applications will be processed regardless of completeness. Incomplete applicants will be notified of the necessary information needed to complete the application, and will be given 30 days to provide said information to Pickaway MHA. If the applicant fails to do so, the application will be placed in an inactive file and retained for three years.

The waiting list will document the final disposition of the application in terms of status such as rejected, withdrawn, or placed in a unit.

Any applicant on the Waiting List is requested to contact the Pickaway MHA every six (6) months to update their information. The PMHA may initiate contact in the form of a routine letter/postcard, sent to all applicants on the Waiting List and stating that if the letter is not responded to within fourteen (14) days, their name will be dropped from the Waiting List without further notice.

- c) Units will be advertised in the local daily paper by display ad. Units will also be advertised in the local resource guides and by other means as trends and media advertising opportunities evolve.
- d) Pickaway MHA uses the TTY/TTD Ohio Relay Services for communication with hearing impaired clientele. For any individual needing assistance, including sight impaired clientele, staff members are available to assist the reading and completion of all forms. PMHA also retains by contract, the services of a sign language interpreter to assist with the paperwork process.
- e) Sometimes residents with disabilities may need a reasonable accommodation in order to take full advantage of the programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the persons with a disability; rather, they make the program accessible to them in a way that would otherwise not be possible due to their disability. Because disabilities are not always apparent, the Pickaway MHA will ensure that all applicants and tenants are aware of the opportunity to request reasonable accommodations.

Reasonable accommodations to each unit are considered on a by request basis. Whenever possible, disabled residents will be placed in a unit that is accessible by design. However, other requests are addressed as quickly as possible and can include changing faucets, doorknobs, and installing visual systems alerting hearing impaired residents to fire alarm's sounding. In addition, reserved parking is set aside for any person with state issued permit, and accessibility ramps are constructed for those with mobility impairments who would benefit from the inclined surface.

- f) If a resident makes a request for reasonable accommodation, the staff reports the request to the maintenance manager who will discuss the request with the Program Manager. If the request is within the scope of maintenance capabilities, and does not result in an undue financial burden on the agency, the request will be reviewed with the Executive Director. If architectural services are required, steps will be made to have a cost analysis completed so that it can be reviewed with the resident. A Medical Nexus verification will be completed only if necessary.
- g) A sample form is attached that is used to record unit condition at move in. A move in work order is created from the form and sent to the maintenance department via the agency work order system. The PMHA staff conducts the move in inspection with each resident family prior to move-in. All deficiencies are noted. All inspection forms shall be a part of the resident's file.
- h) Each tenant meets privately with intake personnel at the time of the intake appointment when being called in off the waiting list. At that time, a thorough interview and review is conducted. The intake personnel reviews with the prospective tenants, requirements on care and use of the property and related facilities. In addition, the intake person and the resident do a move-in inspection together. Additionally each tenant is given a copy of the lease, which includes all regulations for living at the property, and includes the house rules. The resident manager also reviews basic rules and gives guidance at the time the keys are issued at the time of move-in.
- i) The Office Specialist of the Pickaway MHA staff maintains all waiting lists and determines initial tenant eligibility. She also determines the location of all applicants on the waiting list.

The program specialist will also determine eligibility at the point of intake.

- j) This property does not receive tax credits.

4) Procedures for Determining Eligibility and for Certifying and Recertifying Incomes.

- a) Applications and supporting documents are maintained alphabetically in a filing system at the Pickaway MHA office. Application fees are not charged by this agency for any program. Upon being called off the

waiting list, the application for any potential resident is then maintained in a file in the office of a program assistant during the time the tenant's paperwork is being processed. Upon housing, the tenants file is retained in a locked filing cabinet.

- b) All employees must have thorough knowledge of program and management requirements for programs under the auspices of the Department of Rural Development. All management staff will be required to attend training and seminars sponsored by Rural Development and HUD. Staff attended RD training in 2017.

Knowledge shall be proficient in, but not limited to, marketing, procedures to maintain full occupancy, and requirements on meeting affirmative fair housing requirements. Appropriate personnel will have knowledge and training in maintaining and managing waiting lists, tenant selection and screening procedures, inspection of units prior to move-in and during occupancy to guarantee levels of safety and sanitary conditions, and proper procedures for receiving reports of maintenance needs and proper work order response, including energy conservation methods and methods for reporting emergency situations to management.

Appropriate personnel will also be trained in proper procedures to conduct orientation sessions for potential residents, as well as proper procedures for intake and the initial rent calculation for incoming residents. Personnel will also be trained in procedures associated with the annual or interim certification of residents, maintenance of records, and how to prepare for reviews of tenant files and program records by Rural Development. This includes familiarity with leasing policies, rent collection policies and procedures, implementation of rent increases, and other record keeping and reporting requirements.

All applications and income certification information shall be regarded as confidential. The current files shall be maintained alphabetically. All verification will be verified in writing by third party whenever possible and kept on file. When written verification is not possible, documents and oral verification will be used. Rejected applications will be maintained for a minimum of three (3) years, with a cover letter clearly indicating the basis for rejection. Records of previous tenants will be maintained for three (3) years. Recertification dates will be flagged by monthly reporting procedures of Pickaway MHA. Rejected applications will also be maintained until after Rural Development compliance reviews are completed.

Pickaway MHA staff is solely responsible for selecting and screening applicants for residency.

5) Leasing and Occupancy Policies

- a) Occupancy Standards for Williamsport Terrace are as follows:
- Minimum of one person per bedroom; maximum of two persons per bedroom
 - Minimum of one person is allowed for a one-bedroom unit; maximum of two are allowed for a one-bedroom unit.
 - Minimum of two persons is allowed for a two-bedroom unit; maximum of four persons are allowed for a two-bedroom unit

When assigning bedrooms:

- All full-time members of the household are listed on the application and RD Form 3560-8 are counted
- An unborn child may be counted for occupancy but not eligibility determination
- Live-in aides and foster children are counted when determining bedroom size
- Children who are in joint custody arrangements who are present in the household 50% or more of the time
- Children away at school, who live with the family when school recesses, may be counted. Management will not count children who are away at school and who have established residency at another address or location as evidenced by a lease agreement or other proof of another established permanent address or location (not a dorm address)
- Minimum of one person per bedroom, maximum of two persons per bedroom
- Children in the process of being adopted by an adult family member
- Children whose custody is being obtained by an adult family member who will reside in the unit
- Children who are temporarily in a foster home who will return to the family adults living in the unit

Family members that are temporarily in correction facilities:

- If the individual is expected to be released within six months from the date of the lease agreement, the individual can be counted for purposes of determining bedroom size. For any individual who cannot be documented as receiving release for any period exceeding six months, they cannot be counted for purposes of determining bedroom size. All other eligibility criteria applies to the screening of this family member

Nonfamily members such as adult children on active military duty or permanently institutionalized family members or visitors will not be counted in determining unit size.

- b) Applicants will be considered on a first-received, first reviewed basis, based on the date that the completed and signed application is received by the Pickaway MHA.

PMHA will first assign Williamsport Terrace units to in-place residents who have a demonstrated need for a change in housing before offering units to an applicant on the Waiting List. This will be done in chronological order, based on the notification of the site management of the new “need.” All current, in place residents whose needs have been changed will be housed and/or transferred before anyone on the Waiting List is housed.

A tenant who is disabled will not be considered over-housed if the tenant requests an additional room for a live-in aide or an apparatus related to the tenant’s disability.

All persons/families interested in applying for housing at Williamsport Terrace must comply with the following requirements to be considered for housing:

- Applications may be picked up or requested by phone, e-mail (pmha@pickawaymha.com) or online at pickawaymha.org from the Pickaway MHA during the business hours Monday through Friday. Applicants may return the completed application in person during business hours, email (pmha@pickawaymha.com) or mail the document to the Pickaway MHA office; 176 Rustic Drive; Circleville, Ohio 43113
- Applicant must list all family members who will reside in the unit.
- Applicant(s) must meet certain criminal background standards. A criminal background report will be run on the applicant(s) by the designated person at Pickaway MHA.
- Applicant(s) must show the ability to meet financial obligations in a satisfactory manner, and on time
- Provide good/acceptable references from all landlords, both current and previous, listed on the application
- Satisfactory housekeeping habits that will not jeopardize the health, security or welfare of other residents.
- Provide social security numbers for all family members.

All applicants will be required to sign appropriate forms authorizing management to verify any and all factors that affect the applicant’s eligibility or the rent that the applicant will pay.

All adult members of both applicant and tenant households are required to sign forms specifically releasing information and for privacy act provisions. Any request for applicant or tenant information will not be released unless there is a signed Blanket Authorization from the applicant or tenant. This includes credit agencies, businesses, prospective or past landlords, or family members not on the lease. Credit information may be reported to credit agencies upon termination of the tenant from the program.

In the event the applicant is personally unable to complete the forms, the applicant must be present to provide the information to someone assisting in completing the form. The person assisting the applicant must sign and date the application, indicating that it was completed at the direction of the named applicant, and provide identification to management.

When the applicant completes the waitlist application, his/her application will be preliminarily reviewed and placed on the waiting list. Applicants will be informed of receipt of application and placement on the waiting list, or if there is additional information required in order to be placed on the waiting list.

As an applicant’s name approaches the top of the Waiting List, or when an applicant is being offered housing, a formal interview will be scheduled. At that time the applicant is interviewed, all items on the application will be discussed and confirmed, and verification forms will be signed by the applicant authorizing

management to verify all of these issues/items. Until all items are verified, eligibility cannot be determined, nor any housing offered. Management will make an attempt to verify all factors with “third party” written verification, per HUD and Rural Development guidelines. The applicant must be determined eligible to be offered housing.

In the absence of third party verification within 14 days after attempting third party verification, and no response being received, management will use “Review of Documents” to verify items/issues in accordance with HUD and Rural Development guidelines.

All adult members of the approved application will be required to sign a lease that will become effective upon a date mutually agreed to by the Pickaway MHA and the applicant.

The applicant will be provided a signed copy of the lease within 5 days of signature by the Program Manager. At the lease signing, each applicant will be given a handbook which contains policy, grievance procedure information, utility information, maintenance information and other areas significant to becoming a resident at a PMHA facility.

The signing of the lease and the review of financial information are to be privately handled. The head of household and all adult family members will be required to execute the lease prior to admission. An executed copy of the lease will be furnished to the household within five days of signature by the Program Manager and the Pickaway MHA will retain the original executed lease in the tenant’s file.

The applicant will pay a security deposit at the time of lease signing. The security deposit will be equal to the Basic Rent of the appropriate bedroom size unit. The security deposit can be paid in total, or in \$25.00 increments when implemented by signing a payment agreement. In the case of a unit transfer, the security deposit for the first unit will be transferred to the second unit. In the event there are costs attributable to the resident for bringing the first unit into condition for re-renting, the resident shall be billed for these charges.

At least annually, the Pickaway MHA will conduct a re-examination of family income and circumstances. The results of the re-examination determine (1) the rent the family will pay, and (2) whether the family is housed in the correct size unit.

At least 75 to 90 days prior to the date that the certification expires, the PMHA will send a notification letter to the family letting them know that it is time for their annual re-examination and that they must be recertified to remain eligible to continue residence at the property. An appointment will be scheduled to meet with the family in their apartment. The letter includes forms for the family to complete in preparation for the interview, and includes all information the household must provide in order to complete the certification. The letter includes instructions permitting the family to reschedule the interview if necessary. Additionally, reasonable accommodations can be requested for remote meetings to be held.

If the family fails to reschedule or attend the scheduled appointment, the PMHA will issue a second letter rescheduling the appointment, again with the option to reschedule if the established time is not convenient. Both the initial letter and the second notice letter will include time frames for meeting with agency staff and consequences for failure to comply with the recertification process.

Effective Date of Rent Changes for Annual Re-examination: The new certification will be effective the first day of the month following the expiration of the current certification.

Upon receiving the information necessary to complete the Annual Re-examination, PMHA will verify the information and will complete a Form RD 3560-8 with the household. This form will document the calculation of annual income and adjusted income and the calculation of the resident’s payment.

Interim Re-examinations: During an interim re-examination, only the information affected by the changes being reported will be reviewed and verified.

Tenant households will be given an interim re-certification whenever an increase in household income of \$100 or more per month occurs. PMHA will re-certify for changes of \$50 per month, if the tenant requests

that such a change be made. PMHA will complete an interim re-certification whenever a decrease in household income occurs.

Tenants must provide PMHA with the necessary income and other household information required by the agency to establish eligibility and determination of tenant contribution. Tenants must report all changes in household status that may affect their eligibility or the tenant contribution to the PMHA. Tenants who fail to comply with tenant certification and recertification requirements will be considered ineligible for occupancy and will be subject to unauthorized assistance claims.

PMHA must verify household income and other information necessary to establish tenant eligibility for the requested rental unit, in a format approved by PMHA, prior to a tenant's initial occupancy and prior to annual or other re-certifications. PMHA must review all reported changes in household status and assess the impact of these changes on the tenant's eligibility or net tenant contribution. In order to add a household member other than through birth or adoption (including a live-in aide), the family must request that the new member be added to the lease. No individual will be added to the lease if they have indebtedness to the Pickaway MHA. Adult children are not typically added to the lease of any resident, unless under the provision provided for live-in attendants or caregivers. Requests to add adult children will be reviewed on a case by case basis by the PMHA, but no adult child will be added to a lease if the addition creates a condition of overcrowding in the rental unit. Before adding the new member to the lease, the individual must complete an application form stating their income, assets, and all other information required of an applicant. The individual must provide their Social Security number if they have one. The new family member will go through the screening process similar to the process for applicants. The Pickaway MHA will determine the eligibility of the individual before adding them to the lease. If the individual is found to be ineligible or does not pass the screening criteria, they will be advised in writing and given the opportunity for an informal review. If they are found to be eligible and do pass the screening criteria, their name will be added to the lease. At the same time, if the family's rent is being determined, the family's annual income will be recalculated taking into account the circumstances of the new family member. The effective date of the new rent will be in accordance with the paragraph above.

Residents are not required to, but may at any time, request an interim reexamination based on a decrease in income, an increase in allowable medical expenses or other changes in family circumstances. Upon such request the Pickaway MHA will take timely action to process the interim reexamination and recalculate the tenant's rent.

Residents are required to report increases in income within 10 working days of receipt of the income.

Special Reexaminations: If a household's income is too unstable to project for twelve (12) months, including families that temporarily have no income or have a temporary decrease in income, the Pickaway MHA may schedule special reexaminations every sixty (60) days until the income stabilizes and an annual income can be determined.

Effective Date of Rent Changes Due to Interim or Special Reexaminations: Unless there is a delay in reexamination processing caused by the family, any rent increase will be effective the first day of the month following a 30 day notice in writing to the family of the increase. If the family causes a delay, then the rent increase will be effective on the date it would have been effective had the process not been delayed (even if this means a retroactive increase).

If the new rent is a reduction and any delay is beyond the control of the family, the reduction will be effective the first of the month after the interim reexamination.

If the new rent is a reduction and the family caused the delay or did not report the change in a timely manner, the change will be effective the first of the month after the rent amount is determined.

Rents when residents fail to recertify: If PMHA determines and documents that a tenant received a notice specifying a tenant recertification date and the tenant fails to comply by the specified date or fails to cooperate with verification or other procedures related to the tenant's recertification so that the tenant recertification cannot be completed by the recertification date, PMHA, within 10 days of the recertification date, shall give the tenant written notification termination proceedings are being initiated, and that the tenant will be charged

note rent until the tenant's lease is terminated. Any unauthorized assistance received because of the tenant's failure to recertify will be collected in accordance with provisions set forth in the Rural Development Handbook, 3560.208, Subpart O.

Removal of Member From Lease: Whenever members of the household determine that their living situation is no longer satisfactory, they have the right to ask that their name be removed from the lease.

When this situation occurs, Pickaway MHA asks for the cooperation of the involved family member in providing a dated, written statement which requests their name be removed. When this is received, Pickaway MHA will remove the person with the understanding that no reconsideration of this person's status will take place for a minimum of 30 days. The Pickaway MHA will also prepare a lease addendum removing the member which will also reflect any rent change based on loss of income for the absent family member.

If the family member does not cooperate in requesting their name be removed, after they have physically left the household, the Pickaway MHA will take all precaution to determine the status of this member in the household. This can include, but not be limited to, discussions or receipt of written statements from neighbors and family members of the removed member, or interviews with other service providing agencies such as Jobs & Family Services.

A resident household may request a transfer at any time by contacting the Pickaway MHA. The provisions in making an informed decision concerning the transfer of a household are used as a guide to insure fair and impartial means of assigning units for transfers. It is not intended that this policy will create a property right or any other type of right for a tenant to transfer or to refuse to transfer.

Inspections: As discussed elsewhere, a move-in inspection is conducted with the adult members of the household.

Annual Inspections are conducted by Pickaway MHA staff at re-certification time each year. This inspection is conducted to ensure that each unit meets the standards of a decent, safe and sanitary unit. Work orders will be submitted and completed to correct any deficiencies.

Preventative maintenance is conducted along with the annual inspection or as determined necessary by the Pickaway Housing Authority. Preventative maintenance is also discussed elsewhere in the Management Plan.

Notice of Inspections: For inspections defined as annual inspections, preventative maintenance inspections, special inspections, and housekeeping inspection, the Pickaway MHA will give the tenant a minimum of 48 hours written notice.

Emergency Inspections: If any employee and/or agent of the Pickaway MHA has reason to believe that an emergency exists within the housing unit, the unit can be entered without notice. The person(s) that enter the unit will leave a written notice to the resident that indicates the date and time the unit was entered and the reason why it was necessary to enter the unit.

Move Out Inspections: the Pickaway MHA conducts the move-out inspection after the tenant vacates to assess the condition of the unit and determine responsibility for any needed repairs. When possible, the tenant is notified of the inspection and is encouraged to be present. This inspection becomes the basis for any claims that may be assessed against the security deposit.

- c) Management official(s) are expected to be familiar with all aspects of leasing and occupancy policies included in this document, the lease itself, as well as elements included in training materials as presented by representatives of Rural Development and HUD.
- d) As a reasonable accommodation for potential tenants and current tenants of the Pickaway Metropolitan Housing Authority, we will endeavor to provide access to all possible facets of our application process and programs to persons with Limited English Proficiency. Due to our geographic location we have very few applicants or tenants needing this assistance. At this writing we have encountered 2 Spanish speaking tenants, both of whom brought an interpreter with them. We have several deaf tenants and have been able to accommodate them through the Ohio Relay Service for telephone conversations. These tenants have also

either communicated through written communication or with their own interpreter. We also have the following plan in place to assist any current or future applicants or tenants in need of assistance:

- a. When needed, we have the U.S. Census Bureau language Identification Flashcard available to present to any prospective tenant to determine the language in which they wish to communicate
- b. We have as resources, the language instructors at the local area high schools, Ohio University branches in Lancaster and Chillicothe, and The Ohio State University. Circleville is also the location of Ohio Christian University and interpreter services may be available on a limited basis through that organization
- c. PMHA will also seek support from recognized organizations or the respective ethnicity that may be able to provide assistance and interpretation services.
- d. We have a statement of the basic programs available through our office that is written in Braille. Translated documents are available through HUD in specific languages and can be used when appropriate.

6) Rent and Occupancy Charge Collection Policies and Procedures

- a) All rents are paid at the Pickaway MHA office, either in person, by mail, or by using the drop box outside the office. Office hours at PMHA are Monday thru Friday, 8:00 a.m. – 4:00 p.m. Program personnel are responsible for collection of rent. Statements sent the following month reflect the previous month payment and serve as the receipt.

Deposits are made each day for the rents collected via remote capture deposit directly to The Savings Bank. For rents collected after the daily deposit is made, the rents are recorded and stored in the PMHA safe until the following day when they are included in the deposit for that day.

After normal business hours, residents have the option to deposit their payment in a locked drop box, located outside the PMHA staff entrance. The drop box is checked each morning at 8:00 a.m. Rents inside the box are recorded as of the day they are obtained from the drop box.

Residents are not given a receipt at the time of payment. The payment is recorded and shown on the statement issued to the tenant in the next month. All deposits are recorded in the accounting system of the PMHA computerized program.

Each month, the Finance Manager balances and reconciles all deposits and receipts with all resident accounts.

- b) Security deposits are collected at the Basic Rent rate for the appropriate bedroom size of the unit. If the resident wishes to pay his/her deposit in full at the time of move in, they may do so. If the resident wishes to make payments on the deposit, they are also permitted to do so. In this situation, the resident is required to pay \$25.00 at the time of lease signing and \$25.00 minimum per month each month, until the deposit is paid in full. Those opting to make payments must sign a payment agreement that allows them to make such payments with the understanding that failure to do so is a lease violation and can be addressed as such if necessary.

Based on discussions with auditors of this program, we estimate that administrative costs will exceed the interest earned and therefore preclude us from making allocation of the interest earned.

We will review this decision annually and if the interest earned increases and surpasses our administrative costs, we will begin allocating the interest.

Estimates of administrative costs directly related to processing of security deposits are:

- Finance Manager builds a spreadsheet to track the allocation of interest; maintain and update the spreadsheet; reconcile accounts to spreadsheet and ledger
- Project Manager: Supply move in and move out data; determine refund due resident

Based on hourly salaries of these two employees and the estimate of time involved to complete the above tasks, costs would exceed interest earned.

Estimate of time to prepare a Security Deposit Refund Request: Estimated time for preparation of this document is fifteen – thirty minutes per incident to process the security deposit paperwork associated with the move-out of a resident.

The steps of the process included, but are not limited to:

- Informing the maintenance staff that possession has been returned by the tenant
- Tracking the progress of the maintenance staff to determine if charges will be made to the security deposit for repairs deemed beyond reasonable wear and tear. This involves conversations with the Maintenance Manager to establish purchase and installation dates of carpeting, flooring, painting, etc.
- Determine through a review of information available if any unpaid rent or other charges exist
- Preparing the Security Deposit Refund Request form
- Submitting a copy of the form to the Finance Manager
- Preparing a letter and copy of the form for review by the tenant if charges exceed the amount of the deposit. If a refund is given, two copies of the form are given to the Finance Manager so that one copy can be mailed to the former resident, along with the security deposit reimbursement
- If a balance exists, the Intake Coordinator is informed.. A repayment agreement will be established with the tenant and no further housing assistance will be offered to this tenant (through other programs) until this balance is repaid.
- Move-out dates are entered into the computer system.

7) Procedures for Requesting and Implementing a Rent or Occupancy Charge Change

- a) Possible rent increase requests are reviewed annually for need based on operation expenses and budgets and submitted accordingly to Rural Development for review.

Upon receipt of Rural Development's preliminary approval, notice is posted in the laundry room office, and provided to each resident household in writing. The notice informs the residents that a rent increase will take place the first of the month following sixty days of the notice.

Pickaway MHA ensures that all approval is received from Rural Development prior to implementation of the increase on the effective day.

- b) The Executive Director or Finance Manager is responsible for completing all notices in accordance with Rural Development's requirements.

The Program Manager is responsible for oversight of all changes in rents, regardless of their nature.

- c) Change in rents are reviewed in conjunction with the preparation of the annual budget, or if project expenses prove the need for an increase necessary.

8) Plans and Procedures for Carrying Out an Effective Maintenance, Repair and Replacement Program

- a) A major renovation program was completed at Williamsport Terrace in 2009/2010. This renovation included replacement of roofs, downspouts, gutters, doors, windows, hvac/heating systems, renovations of kitchens and baths, and replacement of flooring. Other than normal wear and tear associated with tenant residency, the property is considered to be in excellent condition.

Otherwise, maintenance schedules are performed on a daily basis as follows:

- Work orders will be completed as documented by the PMHA staff when requests are made by Williamsport Terrace residents
- Grounds will be inspected for visual determination of problems that may exist. Trash and debris are removed at this point
- Snow and ice are removed as necessary
- Mowing will be completed once per week, minimum; twice if needed. Pest control will be completed quarterly
- Sewer lines, gutters and downspouts will be monitored and cleaned as needed.

- Annually, each unit will be inspected by Pickaway MHA staff during the certification appointment. Additionally, heating and a/c equipment will be checked, as will hot water tanks, roofs and fascias, and major appliances.
- b) The as-built plans and subsequent renovation plans for Williamsport Terrace are stored in filing equipment in the maintenance office. Maintenance staff keeps records of updates and accompanying records are kept in the office of the Executive Director of the agency
- c) General Maintenance procedures are as follows:
- Appliances and mechanical equipment are checked at move in and at annual certification
 - Smoke detectors are checked at move in, anytime an employee enters the unit, pest control rotation, and annual recertification. Fire extinguishers are not provided. Outside lighting is monitored, with work orders prepared and completed for non-working lights. Snow and ice removal are completed on a continuous basis as needed throughout wintry periods.
 - A move out inspection is completed as each resident family vacates a unit. Determination is made as to the necessary repairs that need completed. Most units are repainted upon move out and units are made in “as good as new” condition whenever possible. The exterior of the building is brick and does not require decorative maintenance
 - Routine maintenance meetings are held to discuss all properties and to discuss major repairs or preventative repairs that may be needed. In the event of emergencies such as fire, storm damage, or structural damage, maintenance and insurance representatives assess the damage and prepare a list of items that need repair. A RFP is then prepared in accordance with the procurement policy of Pickaway MHA. If bids are not necessary, the RFP is submitted to area contractors. If bids are necessary, it is likely that an architect would be selected for the purpose of preparing drawings and schematic documents, and for the preparation of bid specifications and oversight of the repairs

Ground maintenance is part of the ongoing management of the property and is completed by PMHA Maintenance staff. Maintenance also trims bushes and mulches common areas, and at times contract assistance is sought to do weeding and other basic manicure needs of the landscaping.

- Trash hauling is hired after RFP's are prepared and sent to local hauling companies. RFP's are prepared on a two year basis
 - Cleaning of common area's is handled by contract
- d) Residents report maintenance needs to the PMHA office. Emergency maintenance situations include the following:
- No heat at all if the outside temperature is 50 degrees or less
 - Flooding in the unit
 - Failed refrigeration
 - Lack of water
 - Inability to secure the apartment by locking entrance doors or windows PMHA also considers the following maintenance situations emergencies that would encourage after hours calls to the PMHA staff:
 - Main sewage stoppage
 - No electric unless related to widespread power outages due to a storm or weather related emergency
 - FIRES SHOULD FIRST BE REPORTED BY DIALING 911. PMHA would then request a call to the office after the resident has vacated the apartment and alerted all neighboring apartment dwellers if safe to do so.

Emergency numbers are provided to each resident at the time of Intake. All maintenance emergencies will be resolved within 12-24 hours, whenever possible

Maintenance staff visit Williamsport Terrace, on average twice a week. On non-visit days, residents can contact the PMHA office at any time via the office telephone. Routine maintenance requests are processed in the order reported, or in the order of importance as determined by the maintenance staff.

Maintenance staff logs the completed date on the work order.

- e) Invoices are sometimes submitted directly to the maintenance staff upon purchasing materials or equipment. Most often, receipts are given to the staff, and then billing follows within 15-30 days. In each situation,

maintenance submits the invoice or the receipt to the Finance Manager. The receipts are matched to the billing statement. Payments are processed every other Monday, with signing of checks for payment occurring on Tuesday, with payment issued on Wednesday.

At the point when all contracts are signed by the Pickaway MHA, a schedule of payments is presented as part of the contract so that all parties are aware of the payment schedule.

- f) Budgeting for reserve funds is handled by a deposit paid each month into the reserve savings account for the property. To obtain permission to use these reserve funds, a request is submitted with supporting documentation to the Columbus Rural Development office. Upon receipt of approval, repairs are authorized to proceed.
- g) Williamsport Terrace does not offer migrant or seasonally occupied labor housing.

9) Plans and Procedures for Providing Supplemental Services

- a) A laundry facility is located on the grounds of Williamsport Terrace. This facility will be totally accessible when the renovation of the facility is complete in 2010. The coin operated washers and dryers are owned by Williamsport Terrace and the revenue from the machines is included in the facility income as reported.
- b) There is no vending on site

10) Plans for Accounting, Record keeping, and Meeting Rural Development Reporting Requirements

- a) Accounting is kept on approved accounting procedures in the cash method. Year end financial statements are prepared using the accrual basis of accounting.
- b) Interest earned on project reserves is attributed directly. Williamsport Terrace funds are not deposited jointly with other funds. They are separate.
- c) The chart of accounts and bank accounts are compatible with Form RD 3560-7, "Multiple Family Housing Project Budget" requirements.
- d) The Finance Manager will be responsible for completing the annual and quarterly financial reports as required by Rural Development
- e) James G. Zupka, CPA holds the current Auditor of State contract for the audit of Williamsport Terrace. There is no familial or beneficial relationship between any member of this organization and any member of the Pickaway MHA staff.
- f) Retention of records related to the residents and program recipients of Williamsport Terrace is the responsibility of the Program Manager. She/he delegates this authority to the Program Specialist and Agency Specialist. The Finance Manager is responsible for financial recordkeeping and retention.
- g) Records related to the management of Williamsport Terrace will be retained in the offices of the Pickaway MHA. For questions or records related to the day-to-day operation of the facility, and related to resident participation, the Program Manager is the contact person. For records or information related to financial management, the Finance Manager is the appropriate contact person. Record retention is under the guidance of the Record Retention Policy of PMHA.

11) Energy Conservation Measures and Practices

- a) Units are electric and gas, with water and sewer services. Residents directly control usage of these utilities in the apartments. Residents pay the electric and gas charges, and PMHA provides water, sewer, and trash. Tenants are informed that energy conservation is a management concern, and that their best efforts to control electricity and water usage assists us with quality financial management of the facility. Likewise, PMHA installs energy efficient appliances in Williamsport Terrace units.

Residents are not permitted to use electric space heaters, washers or dryers in their individual apartments

- b) Pickaway MHA controls the energy settings in the laundry facility. Pickaway MHA also monitors usage of utilities on a regular and on-going basis.
- c) The objective in utility and energy conservation is to be good consumers of the community and to maintain sound financial management of the property.

12) Plans for Tenant Participation in Rural Rent Housing (RRH) Project Operations and Tenant's Relationship with Management

- a) Tenants are given the opportunity to organize into tenant organizations at Williamsport Terrace. Because the facility is small, tenant interaction with Pickaway MHA is regular, ongoing and informal. Residents regularly contact the PMHA office staff and Director with comments, questions or concerns.
- b) The Tenant Grievance and Appeals Procedure is part of the resident leasing procedure. Information concerning the Grievance Procedure is posted on site, and is available upon request by any resident. Any notice issued to the resident includes reference on how to request a grievance hearing. The Executive Director of the Pickaway MHA hears all requests for informal hearings, and a hearing panel hears all requests for formal hearings.

13) Plans for Member Participation in Rural Cooperative Housing (RCH) Project Operations

Williamsport Terrace is a RRH project and tenant activity procedures are discussed in item 12 above.

14) Plans for Carrying Out Management Training Programs

- a) Staff members are required to annually train on tenant related issues such as procedures including intake and certification. This training traditionally occurs through HUD training instruction such as Nan McKay, Candi Atkins, and OHAC. Staff additionally is seeking qualified Rural Development training. At this time, staff is required to be familiar with and knowledgeable on all aspects of Rural Development handbooks and guidance materials. However, formal training is recommended and taken advantage of when it can be found. Software training is also utilized on a regular basis. Staff completed RD training in 2017.
- b) Staff meetings are held to review current issues relevant to management staff, and to hold or schedule in house training sessions as related to current topics or topics that need refreshed for staff.

15) Termination of Leases or Occupancy Agreements and Eviction

- a) The Program Manager and Agency Attorney are responsible for knowing and administering all relevant State and local laws, Rural Development requirements and HUD regulations regarding the termination of lease or occupancy agreement of any resident participant
- b) The Program Manager and Agency Attorney are responsible for knowing and administering State and local laws, Rural Development requirements and HUD regulations Regarding the notification of resident participants when an eviction or termination is warranted.
- c) The Violence Against Women Act revisions issued in 2017 are inclusive to all operating procedures related to Williamsport Terrace. The agency has adopted a VAWA Policy and Emergency Transfer Plan and follow that plan for all programs administered by the agency.

16) Insurance

- a) The Finance Manager, as well as the Executive Director of the Agency, is responsible for knowing and complying with Rural Development requirements for fidelity coverage and insurance coverage, and for obtaining such coverage.

17) Management Agreement

Because the Pickaway MHA owns Williamsport Terrace, a Management Agreement is not relevant to this property.

NOTE: Reasonable Accommodation Requests will be received and reviewed for all policies and procedures related to the management of Williamsport Terrace.

18) RCH Board/Advisor Relationship

Williamsport Terrace is not a Rural Cooperative

19) Management Compensation

Currently, the management fee is \$816.00 per month, based on a \$51 per unit, per month fee. The fee is paid on a monthly basis.

20) On-Site Management

Williamsport has no on-site management

21) Validity of Management Plan

Borrower Representative
Kim Hartinger
Executive Director, Pickaway MHA
September 25, 2017

Witness to Signature of Borrower Representative

USDA Non-Discrimination Statement

This institution is an equal opportunity provider.

HUD Notification of Non-Discrimination on the Basis of Disability Status

Pickaway Metropolitan Housing Authority does not discriminate on the basis of disability status in the admission or access to, or treatment or employment in, its federally assisted programs and activities. The person named below has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Housing and Urban Development's regulations implementing Section 504 (24 CFR, part 8 dated June 2, 1988): Jean Maynard, Pickaway Metropolitan Housing Authority, 176 Rustic Drive, Circleville OH 43113, Phone: 740-477-2514, Email: jmaynard@pickawaymha.com